

## Kasell Law Firm

September 25, 2023

Hon. Paul A. Engelmayer  
United States District Judge  
United States District Court  
40 Foley Square, Room 2201  
New York, NY 10007

Re: *Ka-Lai Wong v. I.A.T.S.E.*, 23 Civ. 7629 (PAE)

Judge Engelmayer:

Per the Court's Order, I write to confirm that Plaintiff's counsel conferred with opposing counsel this morning who then consented to the request for the three-week extension. This was noted in the first application to the Court albeit perhaps buried in the text. I have bolded and underlined it below for the Court's convenience. The remainder of this letter was previously submitted.

Pursuant to Part 1(E) of this Court's Individual Rules, I write to request an extension to file an amended complaint on behalf of Plaintiff Ka-Lai Wong in the above-captioned action and represent the following:

(1) the original due date is tomorrow, September 26, 2023, and Plaintiff requests a three-week extension until October 17, 2023;

(2) No previous request for an extension of time has been made; and

**(3) Opposing counsel has consented to the request for the extension.**

In addition, as the Court had previously set the due date for Defendant to respond to the amended complaint by October 10, 2023 – *i.e.*, (1) file an answer; (2) file a new motion to dismiss; or (3) submit a letter to the Court, copying plaintiff, stating that they rely on the previously filed motion to dismiss – Plaintiff requests that this date be moved to October 31, 2023.

The reason for this request is that I was retained today to represent Plaintiff Ka-Lai Wong in the above-captioned action and otherwise assist lead counsel, Edward Hayes (who appeared in the state court prior to removal) in the filing of an amended complaint as well

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as any opposition to a motion to dismiss, and I will need time to review the file and conduct the appropriate research to draft the amended pleading.

Respectfully,

/s/ David Kasell  
David Kasell

GRANTED. Plaintiff has until October 17, 2023 to file an amended complaint. Defendant has until October 31, 2023 to respond to the amended complaint.



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PAUL A. ENGELMAYER  
United States District Judge

Date: September 26, 2023  
New York, New York

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